

1 FARHAN R. NAQVI  
2 Nevada Bar No. 8589  
3 PAUL G. ALBRIGHT  
4 Nevada Bar No. 14159  
5 NAQVI INJURY LAW  
6 9500 W. Flamingo Road, Suite 104  
7 Las Vegas, Nevada 89147  
8 Telephone: (702) 553-1000  
9 Facsimile: (702) 553-1002  
10 naqvi@naqvilaw.com  
11 paul@naqvilaw.com  
12 *Attorneys for Plaintiff*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 HAYRI OLIVAS-ARENAS, individually,

16 Case No.: 2:19-cv-00624-RFB-VCF

17 Plaintiff,

18 vs.

19 HOBBY LOBBY STORES, INC. d/b/a  
20 HOBBY LOBBY #679 d/b/a HOBBY  
21 LOBBY; 2199 NORTH RAINBOW  
22 BOULEVARD HOLDINGS, LLC; DOES 1  
23 through 100 and ROE CORPORATIONS 1  
24 through 100, inclusive,

25 **STIPULATION AND ORDER TO  
EXTEND PLAINTIFF'S DEADLINE  
FOR FILING RESPONSES TO  
DEFENDANTS' MOTIONS IN LIMINE**

26 Defendants.

27 Plaintiff HAYRI OLIVAS-ARENAS, by and through her attorneys of record, FARHAN  
28 R. NAQVI and PAUL G. ALBRIGHT of NAQVI INJURY LAW, and Defendant HOBBY  
LOBBY STORES, INC. d/b/a HOBBY LOBBY #679 d/b/a HOBBY LOBBY (“Defendants”), by  
and through its attorney of record, MICHAEL P. LOWRY of WILSON, ELSER, MOSCOWITZ,  
EDELMAN & DICKER, LLP, hereby stipulate and agree as follows:

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30     ///



1           **IT IS HEREBY STIPULATED AND AGREED** that the deadline for Plaintiff to file her  
2 responses to all motions in limine recently filed by Defendants be extended to **October 27, 2023**,  
3 including:

- 4           1. *Hobby Lobby Stores, Inc.'s Motion in Limine 1: Thomas Jennings* [Doc. 58];  
5           2. *Hobby Lobby Stores, Inc.'s Motion in Limine 2: Causation Testimony from Treating*  
6 *Physicians* [Doc. 59];  
7           3. *Hobby Lobby Stores, Inc.'s Motion in Limine No. 3: Undisclosed Damages* [Doc. 60];  
8           4. *Hobby Lobby Stores, Inc.'s Motion in Limine No. 4: Mark James' Felony Conviction* [Doc.  
9 61];  
10           5. *Hobby Lobby Stores, Inc.'s Motion in Limine No. 5: Speculation as to When Spill was*  
11 *Created* [Doc. 62]; and  
12           6. *Hobby Lobby Stores, Inc.'s Motion in Limine No. 6: Post Fall Investigation* [Doc. 63].

13           In accordance with L.R. 16-3(a), replies will only be allowed with leave of court.

14           This stipulation is not brought for purposes of undue delay or any other improper purpose.  
15 Several good causes exist for this extension. Firstly, the trial in this matter is currently set for  
16 January 29, 2024, thereby **rendering December 29, 2024 as the deadline to file motions in**  
17 **limine** pursuant to L.R. 16-3(a). **Defense counsel filed the foregoing motions six (6) months**  
18 **early** out of an abundance of caution, as he is concerned that he will be very busy at the end of  
19 the year with other trials.

20           Secondly, not only will Plaintiff's counsel be **out of the office next week** for a pre-  
21 **planned family vacation**, he is also **undergoing surgery** the following week with a minimum  
22 **recovery time of one week thereafter**.

23           Thirdly, **Plaintiff's counsel has a trial on the July 31, 2023** stack in a state district court  
24 case that was filed in July 2020, wherein the judge has indicated that it is highly likely that the



1 trial move forward towards the end of August because it is one of the oldest cases on said stack.

2 The trial is expected to last at least two (2) weeks and settlement appears unlikely.

3 Lastly, the **parties are scheduled to participate in a settlement conference on August**  
4 **9, 2023** before the Honorable U.S. Magistrate Judge Cam Ferenbach. Defendant's motions will  
5 be moot if this matter resolves at the settlement conference or shortly thereafter.

6 Therefore, the parties respectfully request that the deadline for Plaintiff to file her  
7 responses to all of Defendant's recently filed motions in limine be extended from July 7, 2023 to  
8 **October 27, 2023**, which is still two (2) months prior to the deadline to file motions in limine.

9 DATED this 30<sup>th</sup> day of June, 2023.

10 NAQVI INJURY LAW

11 /s/ Paul G. Albright

12 FARHAN R. NAQVI  
Nevada Bar No. 8589  
PAUL G. ALBRIGHT  
Nevada Bar No. 14159  
9500 W. Flamingo Rd, Suite 104  
Las Vegas, NV 89147  
*Attorneys for Plaintiff*

13 DATED this 30<sup>th</sup> day of June, 2023.

14 WILSON ELSER MOSKOWITZ EDELMAN  
& DICKER, LLP

15 /s/ Michael P. Lowry

16 MICHAEL P. LOWRY  
Nevada Bar No. 10666  
6689 Las Vegas Blvd. South, Suite 200  
Las Vegas, NV 89119  
*Attorney for Defendants*

17 **IT IS SO ORDERED:**

18   
19 RICHARD F. BOULWARE, II  
20 UNITED STATES DISTRICT JUDGE

21 DATED this 3rd day of July, 2023.